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12 Attorneys for Plaintiffs and Cross-  
13 Defendants,  
14 **HIDDEN EMPIRE HOLDINGS, LLC;**  
15 **HYPER ENGINE, LLC; AND DEON**  
16 **TAYLOR AND THIRD-PARTY**  
17 **DEFENDANT ROXANNE TAYLOR**

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA



14 HIDDEN EMPIRE HOLDINGS, LLC;  
15 a Delaware limited liability company;  
16 HYPER ENGINE, LLC; a California  
17 limited liability company; DEON  
18 TAYLOR, an individual,

19 Plaintiffs,

20 v.

21 DARRICK ANGELONE, an individual;  
22 AONE CREATIVE, LLC formerly  
23 known as AONE ENTERTAINMENT  
24 LLC, a Florida limited liability  
25 company; ON CHAIN  
26 INNOVATIONS, LLC, a Florida  
27 limited liability company,

28 Defendants.

**CASE NO. 2:22-cv-06515-MWF-AGR**

Assigned for all purposes to the  
Honorable Judge Michael W. Fitzgerald

**REQUEST FOR ZOOM STATUS  
CONFERENCE**

[Filed Concurrently with Declaration of  
Lawrence C. Hinkle II]

Complaint Filed: September 12, 2022  
Trial Date: December 10, 2024



DARRICK ANGELONE, an individual;  
AONE CREATIVE LLC, formerly  
known as AONE ENTERTAINMENT  
LLC, a Florida limited liability  
company; ON CHAIN INNOVATIONS  
LLC, a Florida limited liability  
company

Counterclaimants,

HIDDEN EMPIRE HOLDINGS, LLC;  
a Delaware limited liability company;  
HYPER ENGINE, LLC; a California  
limited liability company; DEON  
TAYLOR, an individual,

Counterclaim  
Defendants,

DARRICK ANGELONE, an individual;  
AONE CREATIVE LLC, formerly  
known as AONE ENTERTAINMENT  
LLC, a Florida limited liability  
company; ON CHAIN INNOVATIONS  
LLC, a Florida limited liability  
company,

Third-Party Plaintiffs,

v.

ROXANNE TAYLOR, an individual,

Third-Party Defendant

TO THE COURT, ALL PARTIES AND COUNSEL OF RECORD:

Plaintiffs/Counter-Defendants Hidden Empire Holdings, LLC, Hyper Engine, LLC and Deon Taylor and Third Party Defendant Roxanne Taylor (collectively “HEFG”) submit this request for a Zoom status conference to bring to the Court’s attention Defendants Darrick Angelone (“Angelone”), Aone Creative, LLC and On Chain Innovations, LLC’s (collectively “Defendants”) non-compliance with the Court’s directive that Sean Merrick make himself available to testify at the April 9,



2024 evidentiary hearing in connection with HEFG’s pending Motion for Terminating Sanctions (“Motion”).

At the March 18, 2024 Motion hearing, the Court issued a detailed tentative order indicating it was inclined to find by clear and convincing evidence that Defendants both violated the Preliminary Injunction Order issued by the Court and engaged in spoliation of evidence. The tentative order further indicated that the Court was inclined to find that “Jacky Jasper” was an alias used by Defendant Darrick Angelone (“Angelone”) in an attempt to obfuscate his violations of the Preliminary Injunction Order with respect to the Nine Icelandic Domains and the HEFG Twitter account. In arguing in opposition to the Court’s tentative, defense counsel requested an evidentiary hearing and made representations to the Court that, at least with respect to the Nine Icelandic Domains, “Jacky Jasper” is not Angelone but instead is an associate of Angelone’s by the name of Sean Merrick.

In response to defense counsel’s request for an evidentiary hearing, the Court told defense counsel that if it granted the request it expected Mr. Merrick to appear for the hearing to testify about several issues such as: (1) his relationship to Angelone; (2) what he does for a living; (3) the reason for his interest in the Nine Icelandic Domains; and (4) the reason for his becoming involved in Angelone’s dispute with HEFG. Declaration of Lawrence C. Hinkle II (“Hinkle Decl.”), ¶ 2. Exhibit 1, Transcript of March 18, 2024 Hearing.

After further argument, the Court ordered that there would be an evidentiary hearing. The Court further ordered defense counsel to file a declaration containing sufficient information to allow HEFG’s counsel to verify Mr. Merrick was a real person and subpoena him to the hearing in the event refused to appear to testify voluntarily.

On March 19, 2024, defense counsel filed a declaration purportedly signed by Mr. Merrick. (Dkt. 139, ¶¶ 5-6) That declaration claims, among other things, that Mr. Merrick has had the mobile phone number (213) 713-5933 for many years and

1 currently resides in Toronto, Canada at the following address: 2 Foster Crescent,  
 2 Whitby, Ontario, Canada L1R1W2. (*Id.* at ¶ 1.) The declaration makes the further  
 3 representation that if requested to do so, Mr. Merrick will transfer the HEFG domains  
 4 in his possession to Deon Taylor. (*Id.* at ¶ 7.) .

5 On March 20, 2024, the Court issued a Minute Order (Dkt. 140) setting the  
 6 evidentiary hearing for April 10, 2024. The Court's Minute Order further ordered  
 7 HEFG's expert Erin Burke, Defendants' expert Rick Watts, Angelone, and Mr.  
 8 Merrick to testify at the April 10, 2024 hearing. On March 27, 2024, the Court issued  
 9 an order rescheduling the evidentiary hearing to April 9, 2024. (Dkt. 141.)

10 Subsequent to the Court's March 20, 2024 Minute Order, HEFG has met and  
 11 conferred with defense counsel by email over Mr. Merrick's attendance at the  
 12 evidentiary hearing, as well as engaged a private investigator to try to verify the  
 13 accuracy of the information in the purported Merrick declaration. *See*, Hinkle Decl. ¶  
 14 3, Exhibit 2 - Emails between Counsel for HEFG and Defendants. To date, HEFG's  
 15 private investigator has determined that the (213) 713-5933 cell phone number is a  
 16 prepaid "burner" phone. The investigator has also been unable to tie anyone named  
 17 "Sean Merrick" to the Ontario, Canada address provided in the declaration. As a  
 18 result, HEFG has not been able to verify that "Sean Merrick" is a real person or  
 19 otherwise take steps to compel his appearance at the hearing.

20 During the meet and confer discussions, defense counsel has suggested that she  
 21 has communicated with Mr. Merrick but has done nothing to confirm he is a real  
 22 person. Defense counsel has represented that Mr. Merrick is "unavailable" to testify  
 23 at an evidentiary hearing, and that his testimony is not necessary. Thus, defense  
 24 counsel appears to have rejected the Court's order that Mr. Merrick testify at the  
 25 evidentiary hearing. Further, defense counsel first represented that she will provide  
 26 Mr. Merrick's availability for a call to speak with FTI Consulting ("FTI") about the  
 27 transfer of the HEFG domains that remain in his possession, but later reneged stating  
 28 that it is not necessary for Mr. Merrick to speak with FTI to effectuate the transfer.



1 To date, defense counsel has refused to provide dates stating when Mr. Merrick is  
2 available for a call with FTL.

3 Because of the lack of cooperation from Defendants and given that the Merrick  
4 declaration includes information HEFG has been unable to verify, HEFG is compelled  
5 to bring the status of this matter to the attention of the Court to determine what steps  
6 can be taken to ensure Mr. Merrick, assuming he is a real person, appears to testify at  
7 the evidentiary hearing pursuant to the Court's March 20<sup>th</sup> and 27<sup>th</sup> Orders.

8 HEFG therefore requests that the Court set a Zoom status conference at its  
9 earliest opportunity to address the apparent refusal of Defendants and Mr. Merrick to  
10 comply with the Court's order that Mr. Merrick testify at the evidentiary hearing.

11 Dated: March 28, 2024

**SANDERS ROBERTS LLP**

12 By: 

13 Lawrence Hinkle, Esq.  
14 Stephanie Jones Nojima, Esq.  
15 Joshua R. Engel, Esq.  
16 Attorneys for Plaintiffs and Cross-Defendants,  
17 **HIDDEN EMPIRE HOLDINGS, LLC;**  
18 **HYPER ENGINE, LLC; AND DEON**  
19 **TAYLOR AND THIRD-PARTY**  
20 **DEFENDANT ROXANNE TAYLOR**  
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**PROOF OF SERVICE**

(CODE CIV. PROC. § 1013A(3))

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and am not a party to the within action; my business address is 1055 West 7th Street, Los Angeles, CA 90017. My electronic service address is rbruton@sandersroberts.com.

On March 28, 2024, I served the following document(s) described as **REQUEST FOR ZOOM STATUS CONFERENCE** on the interested parties in this action as follows:

**JEFFREY S. KRAMER, ESQ.**  
**SANDRA CALIN, ESQ.**  
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*Co-Counsel for Defendants, Darrick  
Angelone, AOne Creative, LLC, On Chain  
Innovations, LLC*

☒ **VIA ELECTRONIC MAIL** I caused the documents to be transmitted electronically through the approved vendor for e-filing by electronic service on the party(s) identified on the attached service list using the e-mail address(es) shown I did not receive, within a reasonable time after transmission, any email or other indication that the transmission(s) were unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 28, 2024, at Los Angeles, California.

Rhonda Bruton

(Type or print name)

*Rhonda Bruton*

(Signature)

